

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION

JOHN M. PITMAN, III, *et al.*, )  
Plaintiffs, )  
v. ) Civil Action No.: 4:16-cv-179  
XCENTRIC VENTURES, LLC., *et al.*, )  
Defendants. )

**PLAINTIFFS' SECOND SET OF REQUESTS FOR ADMISSION TO DEFENDANT**  
**ANNA RICHTER**

Plaintiffs, John M. Pitman, III and Peninsula Plastic Surgery Center, LTD., by counsel, request that Defendant Anna Richter answer the following Requests for Admission in accordance with the requirements of Rule 36 of the Federal Rules of Civil Procedure:

**REQUESTS FOR ADMISSION**

1. Admit that the audio recording enclosed herein is a true and accurate recording of your conversation with Tracey Richter on February 2, 2014.

**RESPONSE:**

2. Admit that your voice is on the audio recording enclosed herein.

**RESPONSE:**

3. Admit that Tracey Richter's voice is on the audio recording enclosed herein.

**RESPONSE:**

4. Admit that the voice transcribed as "AR" on the audio recording is your voice.

**RESPONSE:**



Respectfully submitted,

JOHN M. PITMAN, III, and  
PENINSULA PLASTIC SURGERY  
CENTER, LTD

By:

  
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*Counsel for Plaintiffs John M. Pitman, III and Peninsula Plastic Surgery Center, LTD.*

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was sent to the following, via e-mail and first class mail, postage prepaid, this 16<sup>th</sup> day of May, 2017.

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*Aasthus*